

**COUNTY OF SANTA BARBARA
PUBLIC WORKS DEPARTMENT**

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SCOTT D. MCGOLPIN
Director

Ms. Tracie Billington and Mr. Joe Yun
California Department of Water Resources
Division of Integrated Regional Water Management
Financial Assistance Branch
Post Office Box 942836
Sacramento, CA 94236
tracieb@water.ca.gov and jyun@water.ca.gov

March 21, 2014

**SUBJECT: Comments on Proposed Language of Draft Guidelines and PSP for Expedited Prop 84
Drought Funding**

Dear Ms. Billington and Mr. Yun,

The Santa Barbara IRWM Region has been active and participatory in the IRWM program since its inception and has benefited through Propositions 50 and 84. We are grateful to DWR staff for their ongoing communication and interest in obtaining and integrating feedback on the IRWM program, specifically as it is related to the expedited Prop 84 funding enabled through the passage of SB 104. The Santa Barbara Region has also been working in coordination with SLO and Santa Cruz IRWM Regions on comments on the Draft Language for the Guidelines and PSP for Expedited Prop 84 Drought Funding. We are, however, submitting individual letters.

1. Our regions are in strong support of allocation of the \$200 on a proportionate regional level as opposed to a statewide competition for funds could be used up by a few projects or regions. While a statewide funding formula would allow for all regions to identify priorities to submit for emergency funds, different regions are affected differently and a statewide competition may not provide a level playing field, especially for those regions that had a smaller allocation under Prop 84 in the first place. Further, a regional allocation formula can give regions more certainty when requesting funds. .
2. Our regions would request and support DWR scoring methodology or criteria methodology that provides funding priority to those regions facing the worst drought conditions. The entire hydrologic region is categorized as D4, or extreme drought, by the National Oceanic and Atmospheric Administration and the National Drought Mitigation Center and many of the IRWM regions in the hydrological area have also declared local drought emergencies.

AA /EEO Employer

Thomas D. Fayram, Deputy Director
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Chris Sneddon, Deputy Director
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Mark A. Schleich, Deputy Director

3. Based on the discussions which occurred during the Roundtable of Regions call on March 18, we understand that DWR is considering language that would enable reimbursement of costs for a project that may be underway before the disbursement of funds. Our regions strongly support authorizing reimbursement – specifically using the date of the statewide and/or local drought emergency announcement as the threshold for claims for reimbursement.
4. Our regions are not supportive of DWRs consideration of participation in CASGEM as a requirement nor are we supportive of prioritizing IRWM regions or jurisdictions implementing CASGEM. While some of our regions and jurisdictions do participate in this voluntary program, CASGEM is not uniformly implemented and the program. It is differentially applied and often evolving. We do not feel this is a reliable metric or requirement to apply. Many regions have on-going and equivalent monitoring programs that provide the same detail and amount of information as CASGEM.

We are happy to discuss the contents and comments in this letter and can be reached at 805.568.3041 or via email at: Bstewart@cosbpw.net.

Again, thank you for the opportunity to comment.

Sincerely,



Bret A Stewart, P.E.
Senior Engineering Manager
Santa Barbara County Department of Public Works